

EX PARTE OR LATE FILED

United Airlines
WHQKX Field Communications Services

RECEIVED

JAN - 8 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 27, 2001

The Honorable Michael K. Powell
 Chairman, Federal Communications Commission
 445 12th Street, SW, Room 8-B201
 Washington, DC 20554

RECEIVED

JAN - 8 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Nextel's White Paper on 800 MHz Reconfiguration

Dear Mr. Chairman:

On November 21, 2001, Nextel, Inc. submitted to the Commission a white paper which proposes to realign the 800 MHz land mobile radio band "to rectify commercial mobile radio - public safety interference and allocate additional spectrum to meet critical public safety needs."¹ Several interested private land mobile representatives subsequently filed a letter with the Commission outlining the impact of this proposal on business and industrial land transportation (B/ILT) users.² This letter serves to support the views of the aforementioned parties in this letter by elaborating on the damage that our particular business will suffer as a result of Nextel's proposal.

Nextel's proposed solution includes relocating B/ILT licensees *at their own cost* to 700 MHz or 900 MHz spectrum; recommending that they otherwise become secondary to public safety on a non-interference basis. United Airlines uses eleven 800 MHz frequencies (WPEZ734 & WNPY697), most of which are short-spaced, at the Denver International Airport. Our radio system is essential to coordinate all of the ground activities required to safely service aircraft flights.

Our initial estimates for relocation indicate that such a transition would cost our corporation more than \$1.5 million dollars just for replacement equipment. The engineering fees, infrastructure construction and installation costs may increase the cost to over two million dollars. Moreover, the proposed relocation spectrum either has no equipment available yet (700 MHz) or is already overcrowded (900 MHz).

¹ *Promoting Public Safety Communications: Realigning the 800 MHz Land Mobile Radio Band to Rectify Commercial Mobile Radio - Public Safety Interference and Allocate Additional Spectrum to Meet Critical Public Safety Needs*, submitted to the Federal Communications Commission by Nextel Communications, Inc., on November 21, 2001.

² Letter from Aeronautical Radio, Inc. (ARINC), American Association of Railroads (AAR), American Petroleum Institute (API), Forest Industries Telecommunications (FIT), Industrial Telecommunications Association, Inc. (ITA), MRFAC, Inc. (MRFAC), and United Telecom Council (UTC) to Michael K. Powell, Chairman, Federal Communications Commission, dated December 20, 2001.

No. of Copies rec'd 1
 List ABCDE

We urge the Commission to reject Nextel's proposal, as it is currently drafted. This action will be detrimental to the American business community; specifically, our nation's daily business communications. It is easy to see that acceptance of this proposal would have an adverse effect on the daily business that Congress and the White House are seeking to support to keep the economy alive. The private wireless industry is fully committed to working with the Commission to find a way to minimize public safety interference. We just ask that the solution not result in the wholesale eviction of private wireless systems from the 800 MHz band.

Sincerely,



Thomas L. Pike
Director Of FCS
United Airlines, Inc.
1200 E. Algonquin Rd
Elk Grove Village, IL 60007

cc: Commissioner Kathleen Q. Abernathy
Commissioner Kevin J. Martin
Commissioner Michael J. Copps
Magalie Roman Salas, Secretary